

Item 1: Cover Page

PERSONAL CFO SOLUTIONS, LLC

Form ADV, Part 2

Firm Brochure

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This brochure provides information about the qualifications and business practices of Personal CFO Solutions, LLC. If you have any questions about the contents of this brochure, please contact us at (908) 955-7055. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Personal CFO Solutions, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Registration as an investment adviser, or any reference to the firm being or the use of the term "registered", "registration" or "registered investment adviser" does not imply a certain level of skill or training.

Item 2: Material Changes

This Disclosure Brochure was updated as follows: (1) Item 4 to reflect the date the firm became registered with the SEC, to remove certain details concerning the process of using Independent Managers, to specify a new service line, and to update its amount of assets under management, (2) Item 5 to reflect the firm's fees for pension consulting services, and to also reflect John Vieira's registration as a representative of Mutual Securities, and details concerning compensation that might be received from the firm's owners in their respective capacities as either registered representatives or insurance agents, (3) Item 7 to identify the type of the firm's clients, (4) Item 10 to disclose other registrations and licenses held by the firm's owners, and the activities that they may engage in through those registrations, (5) Item 11 to reflect that the firm's owners may recommend the sale of insurance products for clients that may result in sales compensation being paid to them, and (6) Item 13 to reflect information about account reviews and reports provided concerning the firm's pension consulting services.

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Item 4: Advisory Business

A. The Firm and its Owners.

Personal CFO Solutions, LLC (“Personal CFO”), is a New Jersey limited liability company that was formed in May 2011, and submitted its initial application for investment adviser registration with the New Jersey Bureau of Securities in June 2011. The firm became registered with the United States Securities and Exchange Commission on March 21, 2012. Personal CFO is owned equally by John Vieira, Patrick Nolan and Bryan Landadio, each of whom also serves as the firm’s Co-Managing Member, and Managing Director. Mr. Landadio also serves as the firm’s Chief Compliance Officer.

B. The Firm’s Services.

As discussed below in this Disclosure Brochure, Personal CFO offers discretionary and non-discretionary portfolio management services, and financial planning and consulting services.

1. Discretionary or Non-Discretionary Portfolio Management Services.

Personal CFO’s portfolio management services involve providing discretionary and/or non-discretionary investment advice based on a client’s individual investment objectives and financial situation on an ongoing and continuous basis. Personal CFO will interview clients and confirm their investor profile and risk tolerance. This profile will be openly communicated and discussed with the client at regularly scheduled meetings. Clients may change their desired profile based upon market, economic and world events as well as personal life events such as a pending retirement. Profiles will begin with Conservative, then progress to Moderate, to Growth, Tactical and Aggressive.

Using the determined client profile, the firm allocates client investable assets among various equity securities (such as exchange-listed and securities traded over-the-counter), investment company securities (such as mutual fund shares), United States government securities, and exchange traded funds (ETFs). In addition to the above securities, Personal CFO recommends that its clients allocate investment assets, on a discretionary basis, among various mutual fund asset allocation models, underlying mutual funds, exchange-traded funds, and/or independent investment manager programs offered through one or more independent managers (the “Independent Manager(s)”). The client may be required to execute a separate written agreement with the Independent Manager(s) and may incur fees imposed directly by the Independent Manager(s).

Neither Personal CFO, nor its principal and/or associated persons, will receive any portion of the fees charged by the Independent Manager(s) or any broker-dealer/custodian. The fees charged by such parties are exclusive of, and in addition to, Personal CFO’s portfolio management fee. In addition to Personal CFO’s portfolio management fee, the client, relative to all mutual fund purchases, shall also incur charges imposed at the mutual fund level (*e.g.*, advisory fees and other fund expenses) (see the additional disclosure within Item 5 of this Disclosure Brochure concerning additional fees that a client’s account may incur).

2. Financial Planning and Consulting.

Personal CFO's financial planning and consulting services are comprised of ongoing financial counseling services for client accounts which incorporate the following areas: investment planning, income tax planning and preparation, estate planning & wealth transfer planning, employee benefit elections, insurance reviews, financing of purchases and cash flow modeling including retirement planning.

Personal CFO provides services to its client via quarterly meetings where financial exhibits are presented, discussed and reviewed. Client meetings typically take place in person with the exception of geographic challenges that preclude face to face meetings. In those instances, teleconferences are utilized.

If requested by the client, Personal CFO will assist the client with the implementation of the financial plan while working with the client's attorney, accountant, and/or insurance agent. Personal CFO may also recommend the services of other professionals if asked by the client. The client is under no obligation to engage the services of any such recommended professional, and retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from Personal CFO.

We may also provide various services relative to client assets not under Personal CFO's management, including reviewing and monitoring such assets, and various activities related to such services.

3. Pension Consulting.

The firm may act as a pension consultant for various pension plans on a non-discretionary basis. In providing pension consulting services, the firm assists the client in determining risk tolerance and investment objectives that are appropriate for each plan.

C. Miscellaneous Information About the Firm's Services.

In connection with the provision of Personal CFO's services, (1) Personal CFO tailors its advisory services to the client's individual needs, (2) clients may impose reasonable restrictions on Personal CFO's services, which may include restrictions on investing in certain securities or types of securities, (3) the client retains absolute discretion over all implementation decisions and is free to accept or reject any recommendation from Personal CFO, (4) Personal CFO is authorized to rely on any and all information that is provided to Personal CFO by the client or any of the client's other professionals (such as the client's attorney or accountant), and shall not be required to independently verify any such information, and (5) each client is responsible to promptly notify Personal CFO if there is ever any change in their financial situation or investment objectives so that Personal CFO is positioned to review, evaluate and possibly revise its previous recommendations and/or services.

D. The Firm's Assets Under Management.

The firm's portfolio management services include both discretionary and non-discretionary asset management. As of December 31, 2012, Personal CFO's total amount of discretionary and non-discretionary assets under management was \$241,865,014 and \$0, respectively.

Item 5: Fees and Compensation

A. The Firm's Fees and Compensation for Services.

Personal CFO's compensation differs based upon the services that it provides to a client.

1. Discretionary and Non-Discretionary Portfolio Management Services.

The annual fee for discretionary and non-discretionary portfolio management services will be charged as a percentage of assets under management, which will generally be equal to 1% of assets under Personal CFO's management. Fees will generally be reduced for client relationships that meet certain asset thresholds.

Clients will be invoiced in arrears at the end of each calendar quarter based upon the average daily market value of the assets in the client's account during the quarter. With respect to a client with multiple accounts, Personal CFO, in its sole discretion, may combine the amount of assets in more than one account in determining the fee to be charged to that client for services on the client's total amount of assets. In addition, Personal CFO, in its sole discretion, may charge a different management fee based upon certain criteria (e.g., anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, type of services required, account composition, negotiations with client, etc.). The client should note that certain of the Independent Manager(s) may charge their fee in advance.

For the initial quarter of discretionary or non-discretionary portfolio management services, the first quarter's fees shall be calculated on a pro-rata basis. In the event of a termination of Personal CFO's services, Personal CFO's annual fee shall be prorated through the date of termination and any remaining balance shall be charged or refunded to the client, as appropriate, in a timely manner or in accordance with the terms of Personal CFO's servicing agreement (if set forth therein).

2. Financial Planning and Consulting.

Unless otherwise negotiated, Personal CFO will charge a fixed or hourly fee for this service, which will range from **\$1,000 to \$20,000** on a fixed fee basis. This fee is a fixed annual fee and will not be increased if client's needs exceed a budgeted number of advisory hours.

If a client engages Personal CFO to provide portfolio management services, Personal CFO, in its sole discretion, may determine to offset all or any portion of its fees for its services based upon the amount paid for the financial planning and consulting services. Under certain circumstances, clients who utilize Personal CFO for portfolio management services as well as financial planning services; may be credited in the form of a reduced planning fee. This offset is at the sole discretion of Personal CFO. In addition, Personal CFO, in its sole discretion, may charge a different financial planning and consulting fee based upon certain criteria (e.g., anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, type of services required, account composition, negotiations with client, etc.).

3. Pension Consulting Services.

Advisor will receive a fee, generally based on a percentage (%) of the assets within the plan, from the client for pension consulting services. The firm charges the plan a fee, in arrears on a quarterly basis, equal to .35% of the assets within the plan for its pension consulting services, which amount will be reduced to .25% of the assets within the plan once the plan assets reach \$2,000,000.

B. Compensation for the Sale of Insurance Products and Annuities

1. John Vieira as a registered representative of Mutual Securities may be entitled to receive compensation from the sale of variable insurance products. In addition, John Vieira, Bryan Landadio and Patrick Nolan are licensed insurance agents, in which capacities each of them may receive compensation from the sale of insurance products.

2. The activities of Messrs. Vieira, Landadio and Nolan as insurance product agents, and Mr. Vieira's activities as a registered representative represent a conflict of interest. They each have an incentive to recommend to a client that the client purchase insurance products (and in the case of Mr. Vieira, variable insurance products) based on their ability to receive compensation from any such purchases, rather than based on a clients' needs. In an effort to address this conflict, it is firm policy that any such transactions be on terms that are acceptable for the industry and that those transactions must be suitable for the client's needs. No client is required to purchase such products through any of the firm's associated persons, and each client has the option to purchase those products through other brokers or agents that are not affiliated with the firm.

3. The firm's fees are in addition to any compensation that is paid to any of the firm's associated persons from the sale of the products referenced in this Item 5.B. The firm will not reduce its advisory fee to offset any such compensation.

C. General Information on Fees.

1. All fees and account minimums are negotiable.

2. Personal CFO's fees may be deducted from the client's account by the client's account custodian or, in the alternative, may be paid directly by the client via personal check on an annual or semi-annual basis.

3. With respect to Personal CFO's portfolio management services, the client may also incur charges imposed directly by the custodian of the client's account, transaction charges imposed by the broker-dealer executing securities transactions for the client's account, and fees and expenses imposed directly by mutual funds held in or for the client's account. For further discussion concerning Personal CFO's brokerage practices, please see Item 12 of this Disclosure Brochure. All fees paid to Personal CFO for its services are separate and distinct from the fees and expenses charged directly by the client's custodian, the broker-dealer, and mutual funds. The fees and expenses imposed by mutual funds are described in each fund's prospectus, and will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. The client should review both the fees charged by the funds and the fees charged by Personal CFO to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Item 6: Performance-Based Fees and Side-By-Side Management

Personal CFO does not have any information to disclose in response to this Item 6.

Item 7: Types of Clients

A. The Firm's Clients.

The firm's client base is comprised of individuals, high net worth individuals, pension and profit sharing plans, trusts, estates, and corporations and other businesses.

B. Requirements for Opening or Maintaining an Account.

1. Minimum Account Size or Annual Fee.

Although Personal CFO does not impose a minimum account size or minimum annual fee, certain Independent Managers may impose more restrictive portfolio or account requirements and may have billing practices that vary from those imposed or utilized by Personal CFO. In such instances, Personal CFO may alter its corresponding account requirements and/or billing practices to accommodate those of such Independent Managers.

2. Advisory Agreement.

Each client will be required to sign a servicing agreement with Personal CFO that sets forth the terms and conditions of their relationship with Personal CFO.

Item 8: Methods of Analysis, Investment Strategies and Risk of Loss

A. Methods of Analysis and Investment Strategies.

1. Methods of Analysis.

Personal CFO will utilize multiple sources including but not limited to Morningstar, Fidelity Advisor Solutions and other subscription services to receive timely and informative economic and market information. At times, this information if deemed extremely relevant or informative, will be passed along to clients as a courtesy.

2. Investment Strategy.

Personal CFO utilizes a primary strategy of long term purchases and Independent Managers, but may utilize short term purchases for tactical purposes. Long term purchases are typically those purchases of securities that are held for at least a year. Short term purchases are typically those purchases of securities that are held for less than a year. Both long term and short term purchases include various risks, including the loss of principal due to market events. Where Personal CFO uses an Independent Manager, it is also indirectly employing the investment strategies used by that Independent Manager, and includes various risks including a lack of transparency and compliance risks associated with the Independent Manager used.

3. Risk of Loss.

Investing in securities involves risk of loss that each client should be prepared to bear.

4. Security related risks.

The firm does not primarily recommend one type of security. Nonetheless, each security is subject to market risks, inflation risks, currency risks, liquidity risks, financial risks and other general economic risks.

With respect to the use of Independent Managers, such an Independent Manager may have had historical success, but such success does not guarantee any future success. In addition, as the firm does not select the underlying investments that may be used by such an Independent Manager, one or more Independent Managers used by the firm to manage the client's assets may purchase the same security, increasing the risk to the client if that security were to fall in value.

Item 9: Disciplinary Information

Personal CFO does not have any information that is disclosable under this Item 9.

Item 10: Other Financial Industry Activities and Affiliations

A. Other Registrations.

See the disclosure to Item 5 above concerning the registration of John Vieira as a representative of Mutual Securities, and the registration of John Vieira, Bryan Landadio and Patrick Nolan as insurance agents.

Each of the firm's owners, through their individual capacities away from the firm may recommend that a client buy insurance or, in the case of John Vieira variable insurance products. Those sales may result in additional compensation being paid to the applicable owner connected with that sale.

The activities of Messrs. Vieira, Landadio and Nolan as insurance product agents, and Mr. Vieira's activities as a registered representative represent a conflict of interest. They each have an incentive to recommend to a client that the client purchase insurance products (and in the case of Mr. Vieira, variable insurance products) based on their ability to receive compensation from any such purchases, rather than based on a clients' needs. In an effort to address this conflict, it is firm policy that any such transactions be on terms that are acceptable for the industry and that those transactions must be suitable for the client's needs. No client is required to purchase such products through any of the firm's associated persons, and each client has the option to purchase those products through other brokers or agents that are not affiliated with the firm.

B. Other Financial Industry Activities.

See Item 10.A above concerning the other registrations of the firm's owners through which they may engage in activities outside of their position with the firm.

C. Other Financial Industry Affiliations.

Please see Item 10.A above.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

A. Description of the Firm's Code of Ethics

Personal CFO has adopted a Code of Ethics pursuant to SEC Rule 204A-1, which serves to establish a standard of business conduct for all of the firm's personnel that is based upon fundamental principles of openness, integrity, honesty and trust. Personal CFO is a fiduciary and therefore has the responsibility to render professional, continuous, and unbiased investment advice. As a fiduciary, Personal CFO must act at all times in its client's best interest and must avoid or disclose conflicts of interest. It is the purpose of Personal CFO's Code of Ethics to emphasize and implement these fundamental principles within its operations.

Information concerning the identity of security holdings and financial circumstances of clients is to be confidential. Failure to comply with the Code of Ethics may result in disciplinary action, which may include termination of employment.

Personal CFO will provide a copy of the Code of Ethics to any client or prospective client upon request.

B. Investing by the Firm and its Personnel

1. Recommending the sale of insurance products for clients that may result in sales compensation to certain firm personnel.

See the disclosure in Item 5.E and Item 10 of this Disclosure Brochure relative to the activities of John Vieira as a registered representative, and John Vieira, Bryan Landadio and Patrick Nolan as insurance agents.

2. The purchase or sale of the same securities as for the client.

Personal CFO and Personal CFO personnel may purchase, sell or hold the same securities for each of its and their own accounts as are purchased or sold for client accounts. These investment activities may present a conflict of interest in the sense that it is remotely possible that Personal CFO's personnel may benefit financially from a transaction effected for a client account, although the volume of such securities transactions have not and do not rise to the level where any transaction in the account of either of the firm or any firm personnel has any appreciable impact on the market value of a security. Nonetheless, the firm believes that it has addressed this conflict of interest through its internal compliance policies. Initially, each such person will be required to report to the Chief Compliance Officer of Personal CFO all securities transactions during the preceding quarter in which she or he had a direct or indirect beneficial interest. Next, employees, officers and directors of Personal CFO are prohibited from using any information acquired in their capacities as such to affect any trade or undertake any activity that may adversely affect Personal CFO's clients or their interests. All are similarly prohibited from (a) furnishing such information to others or otherwise improperly using such information for their own benefit and (b), with respect to individual securities, purchasing or selling individual securities of companies where a client of the firm is employed. Further, neither the firm nor any firm personnel receive any more favorable execution than a Personal CFO client. Lastly, Personal CFO requires that all personnel act in accordance with all applicable Federal and State regulations governing registered investment advisory practices. Any individual not in observance of the above may be subject to termination.

3. The purchase or sale of same securities at or about the same time as in a client's account.

Personal CFO, and/or any person related to Personal CFO, may recommend securities to clients, or buy or sell securities for client accounts, at or about the same time that Personal CFO or the person related to Personal CFO buys or sells the same securities for the account of Personal CFO or Personal CFO's related person. This presents a conflict of interest because Personal CFO or the related person may benefit financially as a result of transactions in that same security that occur in the client account.

Similarly, the value of the security held in the client's account may be detrimentally impacted by transactions in that same security that occur in Personal CFO's account or the account of Personal CFO's related person.

The firm believes that it has addressed this conflict of interest through its internal compliance policies as described in Item 11.B1.

Item 12: Brokerage Practices

A. Factors the Firm Considers in Selecting a Broker-Dealer.

1. Selection Criteria.

Unless a client directs Personal CFO to utilize a particular broker-dealer, Personal CFO may select a broker-dealer for the client's account. In placing orders for the purchase and sale of securities and selecting brokers to effect these transactions, Personal CFO seeks prompt execution of orders at the most favorable prices reasonably obtainable under the circumstances. In doing so, Personal CFO will consider a number of factors, including, without limitation, the broker-dealers financial strength, reputation, execution, pricing, research and service. Personal CFO will weigh the amount of the broker-dealer's compensation against the other criteria it considers in selecting the broker-dealer to execute client securities transactions to determine whether the broker-dealer's compensation is reasonable in light of those other factors.

2. Research and other benefits.

Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, Personal CFO may receive from that broker-dealer/custodian, or have access to, investment research and other practice support materials. These items may be available to Personal CFO as a result of Personal CFO executing client securities transaction through that broker-dealer or Personal CFO's clients utilizing that company to provide custodial services. During the last fiscal year, these items have been in the form of research reports and other securities analysis products, and various written publications on topics relates to Personal CFO's practice. Personal CFO anticipates that any such items will generally be used to service all of Personal CFO's clients.

The foregoing may be perceived to be a conflict of interest. When Personal CFO receives a benefit from a broker-dealer or custodian it does not have to produce or pay for that benefit. Personal CFO arguably would have an incentive to select or recommend a broker-dealer based on Personal CFO's interest in receiving the benefit(s), rather than on the client's interest in receiving most favorable execution. However, the firm feels that it has addressed this conflict because Personal CFO's clients do not pay more for investment transactions effected and/or assets maintained at a particular broker-dealer or custodian as result of Personal CFO's receipt of such benefit(s). There is no corresponding commitment made by Personal CFO any other any entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities, or other investment products as result of Personal CFO receiving these benefits. Further, and most importantly, the benefits received are available to any investment manager executing securities transactions through the broker-dealer, regardless of the volume of execution.

3. Directed brokerage.

Personal CFO does not recommend, request or require that a client direct it to execute transaction through a specified broker-dealer. Nonetheless, Personal CFO may permit a client to request that Personal CFO effect securities transaction for that client's account through a particular broker-dealer. A client's direction of brokerage can limit or eliminate Personal CFO's ability to negotiate commissions (which could result in higher commission costs) and otherwise obtain most favorable execution of client transactions. In addition, Personal CFO may be unable to aggregate orders to reduce transaction costs. If the client directs brokerage, the client will negotiate terms and arrangements for the account with that broker-dealer, and Personal CFO will not seek better execution services or prices from other broker-dealers. As a result, the client may pay higher commissions or other transaction costs or incur greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. In other words, directing brokerage may cost a client more money.

B. Aggregation.

Where Personal CFO is able, Personal CFO will purchase or sell the same securities for several clients at approximately the same time Personal CFO will do this in an effort to obtain "best execution", to negotiate more favorable commission rates, or to allocate equitably among Personal CFO's clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among Personal CFO's clients in proportion to the purchase and sale orders placed for each client account on any given day. To the extent that Personal CFO determines to aggregate client orders for the purchase or sale of securities, including securities in which Personal CFO's principals and/or associated persons may invest, Personal CFO shall generally do so in accordance with the parameters set forth in SEC No-Action Letter, *SMC Capital, Incorporated*. Personal CFO shall not receive any additional compensation or remuneration as a result of the aggregation.

Item 13: Review of Accounts

A. Account Reviews.

1. Discretionary and Non-Discretionary Portfolio Management Services.

Each of Personal CFO's accounts will be monitored by one or more of John Vieira, Bryan Landadio and Patrick Nolan as part of an ongoing process while regular account reviews are conducted on at least a quarterly basis, and whenever significant economic events, changes in market conditions or important new developments concerning a security's effect on the client's account. The firm shall contact ongoing investment advisory clients on at least an annual basis to review its previous services and/or recommendations.

2. Financial Planning and Consulting Services.

Financial planning and consulting services accounts are reviewed by one or more of John Vieira, Bryan Landadio and Patrick Nolan on an "as needed" basis.

3. Pension Consulting Services.

Pension consulting services client accounts are reviewed by John Vieira on an "as needed" basis.

B. Account Reports.

1. Discretionary and Non-Discretionary Portfolio Management Services.

Clients will receive written reports and confirmations of all transactions directly from the broker-dealer or custodian for the client accounts. Depending upon a client's request, Personal CFO may also provide a report to each client that may include such relevant account and/or market-related information such as an inventory of account holdings and account performance on a quarterly basis. Any such report is issued as an accommodation only and the client should rely upon the reports issued by the broker-dealer/custodian of the assets.

2. Financial Planning and Consulting Services.

Personal CFO will provide one or more reports to each client summarizing its analysis and conclusions as requested by the client or otherwise agreed to in writing by Personal CFO.

3. Pension Consulting Services.

Personal CFO will not provide any regular reports to pension consulting services clients.

Item 14: Client Referrals and Other Compensation

A. Non-Clients providing an Economic Benefit to Personal CFO.

See the discussion in this Disclosure Brochure to Item 12.A.2 concerning benefits received by Personal CFO from the broker-dealer in connection with execution of client securities transactions.

In addition, the firm has received additional monetary compensation from Fidelity Investment Brokerage Services to assist it with the initial tasks of establishing its business. Each client should be aware that the receipt of such compensation by the firm from Fidelity creates a conflict of interest since this benefit may influence the firm's choice of broker-dealer over another broker-dealer that does not furnish similar benefits. The firm believes that it has addressed the conflict because Personal CFO's clients do not pay more for investment transactions effected and/or assets maintained at Fidelity a particular broker-dealer or custodian as result of Personal CFO's receipt of such compensation. Personal CFO has not made any commitment to invest any specific amount or percentage of client assets in any specific Fidelity product as a result of Personal CFO receiving these benefits.

Item 15: Custody

The client's assets are maintained with a qualified custodian. The qualified custodian is authorized by the client to deduct and direct payment of Personal CFO's advisory fee directly from the client's custodial account. Each client will receive account statements directly from the broker on at least a quarterly basis. Each client should carefully review those statements. In the event that a client also receives an account statement from Personal CFO, each client is urged to compare the account statement they receive from the qualified custodian with the account statement they receive from Personal CFO, and to rely solely on the account statement received from the qualified custodian.

Item 16: Investment Discretion

Personal CFO's investment management services may be provided on either a discretionary or non-discretionary basis. Where Personal CFO has discretionary management authority, Personal CFO will be authorized to determine the securities to be bought or sold for the client's account(s), the amount of securities to be brought or sold, and the broker or dealer to be used to execute client securities transactions. Nonetheless, Personal CFO, in response to a client request, or where it determines necessary, will communicate its investment recommendations and advice to its clients prior to seeking the implementation of that recommendation and/or advice.

Each client may request reasonable limitations be placed on Personal CFO's discretionary authority, such as securities- or market sector- based limitations. Any such limitations shall be presented to Personal CFO in writing, and Personal CFO will review any such requests on a case-by-case basis.

Personal CFO's servicing contract, and the agreement between the client and the custodian/broker-dealer for the account, may grant discretionary authority to Personal CFO. The client's written agreement with the custodian also grants a limited power of attorney to Personal CFO to effect transactions in the client's custodial account.

Item 17: Voting Client Securities

Personal CFO does not vote client proxies for client accounts. Therefore, although Personal CFO may provide investment advisory services relative to client investment assets, Personal CFO's clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. Personal CFO and/or the client shall correspondingly instruct each custodian of the assets to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets. A client may contact Personal CFO with questions regarding a particular solicitation.

Item 18: Financial Information

A. Financial Condition that is reasonably likely to impair the ability of the firm to meet contractual commitments to clients.

The firm would not be able to meet its contractual commitments to clients if all firm personnel were to die simultaneously or within a period of time of short duration. Under such circumstances, each client should contact his or her account custodian.